IN THE UNITED STATED DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

U.S. BANK TRUST NATIONAL
ASSOCIATION, NOT IN ITS
INDIVIDUAL CAPACITY BUT SOLELY
AS OWNER TRUSTEE FOR RCF 2
ACQUISITION TRUST C/O U.S. BANK
TRUST NATIONAL ASSOCIATION,
Plaintiff,

V.

DONALD CHAE and YOON J. CHAE,
Defendants.

PLAINTIFF'S MOTION FOR ENTRY OF AGREED FINAL JUDGMENT

Plaintiff U.S. Bank Trust National Association, not in its Individual Capacity but solely as Owner Trustee for RCF 2 Acquisition Trust c/o U.S. Bank Trust National Association ("U.S. Bank" or "Plaintiff") and Attorney Ad Litem W. David Griggs representing the interests of Defendant Yoon J. Chae file this *Motion for Entry of Agreed Final Judgment* (the "Motion"), and respectfully show the Court as follows:

The Parties have now reached an agreement to resolve this dispute as evidenced by their counterpart signatures on the *Agreed Final Judgment*. Accordingly, Plaintiff files this Motion and seeks the entry of the agreed judgment that will fully resolve this matter between the Parties, in accordance with their agreement.

WHEREFORE PREMISES CONSIDERED, Plaintiff requests that this Court enter the attached hereto Agreed Judgment in this cause and such other relief to which it is entitled.

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Respectfully submitted,

By: /s/ Nicholas M. Frame NICHOLAS M. FRAME Texas Bar No. 24093448 nframe@mwzmlaw.com

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that on the June 13, 2024, a true and correct copy of the foregoing document was delivered in the method described below:

Via ECF

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Attorney ad Litem for Defendant Yoon J. Chae

Via Regular Mail:

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> /s/ Nicholas M. Frame NICHOLAS M. FRAME

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